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Final Report of the Ad-Hoc Committee on Preferred Callsigns

Committee Members:	Mr. Steve Mendelsohn,	WA2DHF,	Chairman
	Mr. Frank Butler,	W4RH	
	Mr. Tom Comstock,	N5TC	
	Mr. John Kanode,	N4MM	
	Mr. Brad Wyatt,	K6WR	

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**Executive Summary**

The Committee was created by President Wilson to recommend a response to the Board in P.R. Docket 93-305, the Vanity Callsign proposal. The charter from President Wilson included a request that member input be sought in the limited time before the March 7, 1994, filing deadline

To accommodate this request Vice Director Rothberg and the chairman conducted a survey of our respective divisions using packet radio, mail and a request to newsletter editors to reproduce the survey form for club input. Over 730 responses have been received and tallied. Numeric results track with anecdotal results seen in member letters to Headquarters

The Board family has been especially helpful in forwarding and recounting comments from the field. Directors Burden, Comstock, Gordon, Heyn, Kanode, Lewis, Olson, Wyatt, Vice Directors Brackob, (monitoring the discussion on CompuServe) Brown, Frahm and Rothberg have forwarded member response by mail, through Headquarters and electronically to the Committee.

Executive Vice President Sumner made members aware of the Committee's work through an editorial and article in February, 1994, QST. EVP Sumner and VEC Manager Jahnke provided the Committee with an excellent option paper on electronic submission of license requests by various means.

Recommendations**1. Who Should Participate**

The Committee recommends that the Board adopt the position that all amateurs be eligible for participation in the program after an initial phase in period

While 7% of the respondents to the survey were against the program entirely and another 3.5% wanted to limit the program to General class and above, the majority of comments received welcome the creation of the program while recognizing that some method of initial filtering must be used to keep the FCC from being inundated with applications in the beginning.

2. The issue of Fees

The fee quoted in the Docket, \$7.00 per year collected for the length of grant of license (10 years), was set by Congress in the Budget Reconciliation Act of 1993. To change the amount or type of fee would require the League to commit its efforts in the Congress toward changing the fee.

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The Committee recommends that the League seek such relief in favor of a one time administrative processing fee with the understanding that no amateur licensee should incur a user fee.

There is no periodic processing expense related to this program after the initial look-up work has occurred. Labor involved with renewal of a Preferred Callsign will not differ in any way from the renewal of a non-preferred callsign, therefor the Committee believes no additional labor charge should be incurred by the licensee.

During the course of this proceeding people filed comments with the Commission asking why those with Preferred Callsigns have to pay recurring, yearly fees. The Commission's response may well be to ask that ALL amateurs pay such user fees. Without question, this would be viewed as an undesirable outcome to such a question.

Additional factors supporting the one-time administrative fee position include the time value of money and reduction in administrative workload.

The Government benefits by collecting the entire fee at the beginning of the process rather than on a yearly basis or at the end of the license term. The one-time fee concept would also greatly reduce the Commission's fee collection workload by not having to administrate an ongoing fee collection process at license renewal time.

3. Holders of previous Preferred Callsigns

The Committee recommends a statement that any callsign held prior to the start of this program shall be considered a sequential callsign and exempt from any administrative fee associated with this program.

4. Phase-in Periods and Priorities

The Committee recommends a phase-in period to allow the Commission a reasonable chance to process the expected heavy initial submission of applications.

Conversations with Commission Information Services staff in Gettysburg indicate that no additional application processing manpower will be used to work on Preferred Callsign applications. The same four people who process all new and renewal form 610s will be processing the new form 610-V as well. Therefore, a phase in period would be wise to prevent severe overload at Gettysburg.

Phase-in periods may be perceived as "gates". As each succeeding gate opens it will admit applications from a new group as well as any group allowed by a previous gate.

Gate one would allow applications from holders of previous callsigns who have lost their original call through failure to renew at the proper time or having moved from one location to another mandating a change of callsign. A callsign could be recovered even if it did not match the applicants current permanent address.

Included in this group would be those who wish to obtain the callsign of a direct family member. The term direct, as used here, would only include a brother, sister, spouse, son or daughter of the original licensee.

The Committee recommends that clubs with lapsed club licenses also be allowed to recoup those callsigns in the first group.

The second gate would include all Extra Class licensees and those enfranchised by gate one.

The third gate would include all Advanced Class licensees and those enfranchised in gates one and two.

At this point the system would be thrown open to anyone else desiring a Preferred Callsign.

5. Club Applications

Clubs wishing to obtain the callsign of a silent key member could do so in the second gate period if the trustee of the club were an extra class licensee. This should present no problem for most legitimate clubs. Similar logic would apply to trustees with other classes of license.

The Committee believes family members should have first choice of a silent key's call. Should no family member desire the call, the club should have next choice.

It is been the League position that the number of members of a club be raised to at least 4 for a group to be considered a "radio club". This proceeding again emphasizes the need for the Commission to raise the number of members needed to ensure legitimacy and prevent fraud.

The League's Part 97 Rewrite Committee suggested raising the number of members required in Part 97.5(d)(2) from two to four. **The Committee recommends** this proceeding be used as an opportunity to restate that position.

The Committee recommends that, for purposes of defining a legitimate club in Part 97.5(d)(2), the number of members be raised from the current 2 to at least 4.

6. Vacated Callsigns

As proposed in the NPRM, a call is considered "vacated" when its previous owner has been assigned a Preferred Callsign. The Commission would put the vacated call into the available pool immediately. The Committee believes this could lead to many problems. As an alternative...

The Committee recommends that the vacated callsign not be reassigned for a two year period.

Incoming QSL bureaus, especially, have noted that many services count on the user callsign being correct. An instant reassignment of a prior held call to a new licensee could cause multiple problems for volunteer service groups, such as the bureaus.

Another consideration is "trafficking in callsigns" The Committee believes that a two year hold on a vacated callsign would preclude questionable practices arising in which one amateur would persuade another to change their call so the first amateur could acquire the desired call. This practice could open up a new area of fraud allowing people to submit questionable documents showing that amateur B wanted to give up a call so amateur A could acquire it.

7. Number of Choices on Form 610-V

The Committee recommends that the number of choices be increased to 25.

This should reduce processing and correspondence time if the 10 requested callsigns are all unavailable. The applicant need not fill in all 25 callsigns, but it would increase the chance of a positive match if the applicant had 25 choices.

8. Retirement of Callsigns

A small number of commenters stated the belief that re-issuance of callsigns of silent keys would be somehow disrespectful. The Committee does not share this viewpoint.

While the Committee was sensitive to the fond memory the silent key's friends might have, the callsign is really the "property" of the Commission and is part of the condition of grant to the licensee. In essence it is "loaned" to the licensee for the term of the license. It would, therefore, become eligible for re-issuance once the renewal grace period had expired.

If an individual passed away just before license renewal time it would be at least two years before the callsign became available for re-issue at the end of the renewal grace period. A more probable condition would be that the licensee would pass on in the middle of the license term. Then the callsign would not become available for between four and seven years after the amateur passed on.

Should an individual, club or group think highly of the deceased, nothing precludes finding an inactive ham and asking the individual to change callsigns by requesting the silent key's old callsign through this program.

9. Out of Area Callsign Issuance

The Committee recommends that within the lower 48 states the Commission continue issuing callsigns with the number within the callsign relative to the applicants current permanent address. This recommendation would be for Preferred Callsigns as well as sequentially generated callsigns.

A quick historical retrospective is in order at this point. One of the original reasons for breaking the continental United States into ten callsign districts was to help the FCC's Field Operations Bureau begin to locate an emitter for enforcement purposes.

Today's state-of-the-art direction finding does not need to know which callsign district the emitter is located in. This fact was part of the rationale the Commission used in eliminating the requirement for a licensee to sign "portable" when away from the licensed station location. Therefore, the Commission doesn't appear to care whether the a licensee has a district indicator consonant with the operators station location.

However, anecdotal evidence in letters and on survey forms indicates that, contrary to the Commission's technological needs, most amateurs have grown accustomed to the practice of callsign numbers indicating which area of the country the licensee is in and would like the tradition continued. The callsign number gives the operators on each end of the circuit an immediate indication of where the other is and "in which direction to turn the beam."

Therefore, **the Committee recommends** this tradition of issuing callsigns with the number within the callsign consonant with the applicants current permanent address be continued.

10. Outside of the Continental United States

Amateurs in Alaska, Hawaii, Puerto Rico, the American Virgin Islands and in the Pacific have shared their concern with Directors Wyatt and Butler about amateurs being able to acquire callsigns from their area without being a current permanent resident. This is a valid concern because in some areas, notably Hawaii, the KH6 callsign block is nearly gone. Most of it has been assigned to visitors and those who are now deceased.

While the re-issuance of callsigns of deceased amateurs will ease the problem, **the Committee recommends** that outside the continental 48 states applicants be required to furnish the Commission with some form of documentation indicating permanent residency. Visitors would continue to use the portable designator, thereby not depleting a callsign pool available only to permanent residents.

11. Specific Comments on the NPRM

New 97.19 (c) Substitute the following:

Each request for a renewal of a operator/primary or club station license retaining a call sign assigned under the vanity call sign system shall be made on FCC form 610-V. The form must be submitted [eliminate "with the proper fee"] to the address specified in the Private Radio Services Fee Filing Guide. To renew the license without retaining a vanity call sign, the applicant must use FCC form 610 as specified in Section 97.21.

New 97.19(f)(3)

A call sign that is vacated by the licensee is [add "not"] available to the vanity call sign system [add "for 2 years following the expiration of the license"].

Sentence Added to the end of 97.19(g)

A callsign previously held by the applicant, available to the vanity callsign system but expired, may be requested without regard to license class group or current permanent residence.

New 97.19(g)(1)

The applicant must request that the call sign held be canceled and provide a list of up to [change 10 to 25] call signs in order of preference. The list will automatically end with the call sign vacated as the [change "tenth" to "twenty sixth"] choice.

New 97.19(g)(2)

The first available call sign from the applicant's list will be assigned. When none of those call signs are available, the call sign vacated by the applicant will be reassigned [add "and the administrative fee returned".]

New 97.5(d)(2)

A club station license (FCC Form 660) issued to the person by the FCC. A club station license is issued only to the person who is the license trustee designated by an officer of the club. The trustee must hold an FCC-issued Amateur Extra, Advanced, General or Technician operator license. The club must be composed of at least [change "two" to "four"] persons and must have a name, a document of organization, management and a primary purpose devoted to amateur service activities consistent with this Part.

12. Questions Posed in the Discussion Section

In paragraph 5 the Commission asks about alternative ways to file form 610-V.

The Committee recommends that the same, simple, ASCII format used in League contest filings be recommended to the Commission IS group as a starting point for electronic filing

In Paragraph 6 the NPRM requests comments on distribution of available callsign information.

The Committee recommends that a League computer and modem, or HIRAM be made available, in the short term, as a distribution method with the Commission filing at least weekly updates or sending a disk or disks detailing callsign availability.

Alternately, for-profit data services, such as Compuserve's Hamnet forum, could be used by the Commission to make current callsign information available.

13. Special Event Callsigns

The Committee recommends that 1 X 1 callsigns, such as K2A, be made available for limited duration special events of national significance.

There are likely to be few special event stations of national significance operating at any one time within a single call district. Therefore, the issuance of a 1 X 1 callsign should be possible without measurably adding to the Commission's workload

14. Final Comments

The Chairman would like to thank the Directors Butler, Comstock, Kanode and Wyatt, EVP Sumner and VEC Department Manager Jahnke for the hard work they did in such a compressed time period.

A statistical treatment of the data used to derive the Committee's position will be sent as an enclosure to this report.

Respectfully Submitted,

Stephen Mendelsohn, WA2DHF, Chairman

Vanity Callsign Survey Statistical Results - March 16, 1994

1. **Total Survey Respondents** = 760

2. **Demographics:** Base=760

Extra	Pct	Adv	Pct	Gen	Pct	Tech	Pct	Nov	Pct
347	46%	183	24%	97	13%	121	16%	12	2%

3. **Method of Determination:** Base=760

First Come, First Served	Assign By Some Priority	Against Program
190 (25%)	521 (69%)	49 (6%)

4. **Desired Primary Selection Criteria:** Base = 521 (Those that asked for selection by some priority)

License Class	209	40.12%
Previous Call	189	36.28%
Time in Class	11	2.11%
Total Time Licensed	45	8.64%
Silent Key Call	27	5.18%
Out of Area Call	14	2.69%
Obtain Club Call	26	4.99%
Total	521	100%

5. **Method of Payment:** Base = 692 (Total less those against program)

Every Ten years: 445 (64.31%) **Life Time:** 247 (35.69%)

6. **Notes:**

License class: Allow callsign selection by descending license class starting with Extra

Previous Call: Allow individual to recover previously held call

Time in Class: Time in current license class

Total Time Licensed: Total time licensed as an amateur

Silent Key Call: Allow individual to get call of a silent key

Out-of-Area Call: Allow individual to change to correct area call

Obtain Club Call: Allow individual to become trustee of club call

7. **States Responding:** ME, NH, RI, MA, CT, VT, NY, NY, PA, MD, VA, FL, AL, KY, TN, TX, CA, WA, OR, ID, OH, IL, IN, WI, MN, MO, LA, WY

Of 760 Respondents 521 wanted selection by some type of priority

1. 209 (40%) chose **license class** as first priority, second priority was:

Previous Call:	68	Recoup silent key call:	13
Time in Class:	32	Out-of-area call change	7
Total time licensed:	67	Obtain club call:	8
No Second Choice:	14		

2. 189 (36%) chose **obtaining previous call** as first priority, second priority was:

License Class:	76	Recoup silent key call:	54
Time in Class:	4	Out-of-area call change	10
Total time licensed:	23	Obtain club call:	9
No Second Choice:	13		

3. 11 (2%) chose **time with current license grade** as first priority, second priority was:

License Class:	2	Recoup silent key call:	1
Previous Call:	2	Out-of-area call change	0
Total time licensed:	6	Obtain club call:	0
No Second Choice:	0		

4. 45 (9%) chose **total time licensed** as first priority, second priority was:

License Class	21	Recoup silent key call:	1
Previous Call:	8	Out-of-area call change	2
Time in Class:	11	Obtain club call:	0
No Second Choice:	2		

5. 27 (5%) chose **getting a silent key's call** as first priority, second priority was:

License Class:	4	Time in license class:	0
Previous Call:	13	Out-of-area call change	0
Total time licensed:	5	Obtain club call:	2
No Second Choice:	3		

6. 14 (3%) chose **callsign area change** as first priority, second priority was:

License Class:	3	Time in license class:	0
Previous Call:	6	Silent Keys Call:	1
Total Time Licensed:	0	Obtain club call:	4
No Second Choice:	0		

7. 26 (5%) chose **getting a club call** as first priority, second priority was:

License Class:	3	Time in License Class:	0
Previous Call:	9	Recoup silent key call:	5
Total Time Licensed:	4	Out-of-area call change:	2
No Second choice:	3		

Editorial Comments:

The Committee report reflects what has been requested in the survey forms, member letters, Committee discussions, telephone calls and club visits by Board members.

1. The packet/mail survey

This is not a burning issue in the minds of most amateurs. Those most likely to be enfranchised are those responding. However, many meaningful comments were received with the survey forms. All but 49 of 760 view the program positively, requesting certain elements be given emphasis over others.

2. Letters from members sent to Headquarters

Headquarters has forwarded almost four dozen letters to the Committee from members. The anecdotal comments very closely reflect the numeric results obtained from the survey.

Many Board members sent MCI communications to the Committee paraphrasing responses during club visits. Even the active, but short lived, discussion on Compuserve was related to the Committee as input for discussion.

3. The Tale of the Numbers

The two most important issues reflected in written comments are allowing amateurs with previous calls to recoup those calls, no matter what their current license class, and allowing Extra and Advanced class licensees first access to the available callsign pool in class order.

The ability to get a club call, one of the main drivers of this proposal in the past, has little bearing on the current desires of those individuals commenting on this survey. The League comments to the Commission on this matter will simply reflect prior Board policy supporting the concept of Club licenses.

4. Personal note

The Committee has worked long and hard on these recommendations. We hope you can and will support them.

Respectfully Submitted,

Stephen Mendelsohn, WA2DHF